

A Professional Corporation
MARTINEZ & RITORTO
Attorneys at Law

30 Wall Street, 8th Floor
New York, New York 10005

Tel. 212-248-0800
Fax. 212-248-0990

February 27, 2020

Via ECF

Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East, Chambers 704S
Brooklyn, NY 11201

Re: Lynda v. JetBlue Airways Corporation
Docket No.: 20-CV-47 (BMC)

Dear Judge Cogan:

The Parties submit this joint letter pursuant to Your Honor's Order and Notice of Initial Conference, dated January 13, 2020, in anticipation of the Initial Conference before the Court scheduled for March 3, 2020, at 4:30 pm.

The above-referenced action arises out of an alleged incident on board JetBlue Flight 1562 from Grantley Adams International Airport, in Barbados, bound for John F. Kennedy International Airport, NY, on November 28, 2019. Plaintiff alleges that the flight attendants on board the aircraft treated him in an unfair manner, denied him boarding, and wrongfully had him escorted from the flight by local law enforcement. Plaintiff alleges that, after he was deplaned, he was taken into custody and questioned by law enforcement officers, but ultimately released. He further alleges that he was permitted to board another JetBlue flight the following day and thereby returned to New York.

Plaintiff's Complaint contains causes of action for Breach of Contract, Violation of the Federal Aviation Act of 1958, False Imprisonment, Intentional Infliction of Emotional Distress, Assault, Battery, and Punitive Damages. Jurisdiction in this matter is based upon federal question, 28 U.S.C. §1331, for alleged violation of the Federal Aviation Act of 1958. Defendant has denied all material allegations of Plaintiff's Complaint, and asserted various defenses to Plaintiff's common law claims. Defendant contemplates a possible dispositive motion after the conclusion of fact discovery.

Respectfully Submitted,

ROGER V. ARCHIBALD, PLLC.

MARTINEZ & RITORTO, P.C.

BY: /s/ Roger V. Archibald
Roger V. Archibald

By /s/ Michael Maragoudakis
Michael Maragoudakis (MM8088)

26 Court Street, Suite 711
Brooklyn, N.Y. 11242
(718) 779-8910

Attorneys for Plaintiff

30 Wall Street, 8th Floor
New York, New York 10005
(212) 248-0800

Attorneys for Defendant

JETBLUE AIRWAYS CORPORATION